

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

CONTAINS CBI – DO NOT RELEASE TO REGISTRANT

SIMILARITY CLINIC MEMORANDUM:

Subject: EPA Reg. No.: 84229-GU/Tide USA TEBU 3.6F
Decision No.: 417655
PC Code: 128997

From: Marianne Lewis, Biologist
Insecticides/Rodenticides Branch
Registration Division (7505P)

To: Hope Johnson, PM 21
Fungicide Branch
Registration Division (7505P)

Applicant: Tide International USA, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St NW
Gig Harbor, WA 98332

M. Lewis
JCA
1/30/14

FORMULATION FROM EPA Reg. No. 84229-GU LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Tebuconazole:	38.7%
<u>Inert Ingredient(s):</u>	61.3%
Total	100.0%

BACKGROUND: The registrant is citing acute studies to support their product, EPA Reg. No. 84229-GU. The MRID's are as follows: 412633-06 (81-1), 412633-08 (81-2), 415898-02 (81-3), 412633-04 (81-4), 412633-07 (81-5), 412633-09 (81-6). These studies were reviewed by PRS/RD on 3/6/90 and 5/13/91. These studies were initially submitted to the Agency to support two almost identical products – the only difference being that one contained a [REDACTED] and the other did not contain the [REDACTED]. The test material used in the acute tox studies did not contain the [REDACTED]. The reviewer stated that the studies were acceptable however they could not be used to support the registration of the product that contained the [REDACTED].

The new product, EPA Reg. No. 84229-GU, does contain the [REDACTED]. This [REDACTED] was a new additive back in 1991. Since then, many products have been successfully registered by the Agency which contain this [REDACTED]. Based on this the Sim Clinic does not believe that this [REDACTED] will change the toxicity profile of the cited data.

After reviewing comparing the CSF's for the subject product and the product tested in the cited studies, the Agency will allow the registrant to cite five (81-1, 81-2, 81-3, 81-4, 81-5) of the studies listed above to support the subject product. The subject product will be classified as a skin sensitizer based on information indicating that the [REDACTED] has the potential to be a skin sensitizer.

RECOMMENDATIONS:

- Five (81-1, 81-2, 81-3, 81-4, 81-5) of the acute toxicity studies cited are acceptable to support EPA Reg. No. 84229-GU.
- The subject product will be classified as a skin sensitizer.

The acute toxicity profile for EPA Reg. No. 84229-GU is currently:

Acute Oral	III
Acute Dermal	III
Acute Inhalation	III
Primary Eye	IV
Primary Dermal	IV
Skin sensitization	skin sensitizer

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 84229-GU

TIDE USA TEBU 3.6F FUNGICIDE

SIGNAL WORD:

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A). Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.